

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

IN RE: Billie T McRae * Case No. 09-23787

Debtor(s). * Chapter 13

* * * * *

**DEBTOR'S OBJECTION TO SECURED CLAIM NUMBER 4
AS FILED BY FFPM CARMEL HOLDING, LLC**

Billie T. McRae (the "Debtor"), through the under-signed counsel, and in response to the Claim #4 filed by FFPM Carmel Holdings, LLC, objects thereto on the following basis:

1. The creditor, FFPM Carmel Holdings, LLC (the "Claimant") filed a Proof of Claim # 4 on November 23, 2009, that was entered thereafter (the "Claim #4") in the amount of \$1278.66.
2. The Debtor disputes this debt in it's entirety.
3. That the Debtor has not been found to be liable for said debt through any Court of Law.
4. The Claimant attached no proof in support of it's secured claim.

THAT NOTICE IS HEREBY GIVEN TO CLAIMANT THAT WITHIN 30 DAYS OF THE DATE ON THE CERTIFICATE OF SERVICE OF THE OBJECTION THE CLAIMANT SHALL FILE AND SERVE A RESPONSIVE MEMORANDUM OPPOSING THE OBJECTION AND SHALL REQUEST A HEARING IF DESIRED, UNLESS THE CLAIMANT WISHES TO RELY SOLELY UPON IT'S PROOF OF CLAIM; AND THAT A HEARING MAY BE HELD AT THE COURT'S DISCRETION.

WHEREFORE, the Debtor respectfully requests that this Honorable Court:

- A. Disallow the Proof of Claim number 4 as filed by Billie T McRae in its entirety.
- B. Such other and further relief as this Court may deem appropriate.

Respectfully submitted,

December 21, 2009

_____/s/_____
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